

Attorneys for Defendant
TERRY JACKSEN

UNITED STATES OF AMERICA,
Plaintiff,
v.
TERRY JACKSEN,
Defendant.

**STIPULATION AND ~~proposed~~
ORDER TO CONTINUE
HEARING**

STIPULATION AND ~~[PROPOSED]~~ ORDER TO CONTINUE HEARING
No. CR

1 Prior to that hearing, counsel for Mr. Jacksen and Mr. Taylor discussed the possibility of
2 Mr. Jacksen entering residential drug treatment. However, Mr. Taylor explained that at that time
3 he believed for several reasons it was not feasible to place Mr. Jacksen in residential drug
4 treatment. Still, Mr. Taylor learned about 10 days ago that he could place Mr. Jacksen in
5 residential treatment for 31 days, and on September 27, 2017, Mr. Taylor enrolled in a residential
6 treatment program. As Mr. Taylor wrote to both counsel:
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8 Terry Jacksen has a pending revocation matter schedule before the court on
9 October 10, 2017. The nature of the violations of supervised release are all
10 substance abuse related. On September 27, 2017, Terry Jacksen entered Turning
11 Point residential substance-abuse treatment program in Santa Rosa. He was able
12 to be placed on a 31-day residential bed space.

13 United States Probation has been able to confirm with [Mr. Jacksen's] employer
14 that they will hold his position until his release on or about November 1, 2017.
15 Based on the nature of the violations pending before the court, United States
16 Probation, Scott Sugarman (defense counsel), and Claudia A. Quiroz (Assistant
17 United States Attorney) jointly believe that residential substance-abuse treatment
18 is in Mr. Jacksen's best interest.

19 As a result, it is respectfully requested that the court move the pending revocation
20 matter to November 21, 2017.

21 The parties request this continuance because Mr. Taylor informed counsel for both parties
22 that Turning Point does not permit the participants in their residential drug treatment program to
23 leave during the program. Because Mr. Jacksen will not have concluded the program by the
24 October 10, 2017 hearing, the parties respectfully request a continuance so that his treatment is
25 not disrupted.

26 The parties concur in Mr. Taylor's comments above, and believe it would be useful to
27 allow Mr. Jacksen to complete the 31-day residential program he entered a week ago. Counsel
28 are not able to appear until November 21, 2017. Accordingly, the parties STIPULATE to

1 continue the scheduled hearing from October 10, 2017 at 2:00 p.m. to November 21, 2017 at
2 2:00 p.m.

3 Undersigned defense counsel spoke with United States Probation Officer Taylor and he
4 agrees with this requested continuance.

5 IT IS SO STIPULATED.

6 DATED: October 5, 2017


7 /s/
8 Claudia A. Quiroz
9 Assistant United States Attorney

10 DATED: October 5, 2017

11 /s/
12 Scott A. Sugarman
13 Attorney for Terry Jacksen

14 SO ORDERED.

15 DATE: October 5, 2017.

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17 WILLIAM H. ALSUP
18 UNITED STATES DISTRICT JUDGE
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